

DATA PRIVACY COMMITTEE CHARTER
OF
GMO-Z COM SECURITIES (THAILAND) PUBLIC COMPANY LIMITED

1. OBJECTIVE

This Charter sets forth the responsibilities of the Data Privacy Committee (the "Committee") of GMO-Z com Securities (Thailand) Public Company Limited, in fulfilling the purposes described herein. The Committee, through delegation from the Board of Director of Company (the "Board"), has principal responsibility to assist the Board with respect to privacy and data use matters, including

- assist the Board of Directors in fulfilling its risk oversight responsibilities with respect to the protection of personal information of all stakeholders;
- supervise and monitor the soundness of the Company's data protection strategies and practices;
- oversee and monitor the Company's material compliance with applicable data protection laws, industry standards and contractual requirements;
- oversee the Company's data protection performance and the overall implementation of the Company's data protection strategy.

2. COMMITTEE MEMBERS

The Committee shall be composed of at least five members appointed by the Board. Members shall appoint one of member as a Chairman. The Committee appoints one person as its secretary. The committee members must not have conflicts of interest or can use the Company's opportunities or information for their benefit, directly or indirectly.

The Committee serves a term of three years from the day on which a resolution is passed for the appointment.

In case any position on the Committee is vacant due to reasons other than expiration of term, the Board shall appoint a fully qualified person to the Committee for the remaining term of the member whom he/she replaced.

3. MEETINGS

(1) Frequency of Meetings

Meetings shall be held at least once in every two months. Special meetings may be convened by the Committee Chairman as required.

(2) Minutes

Minutes of each Committee meeting shall be made in writing.

(3) Quorum and voting

At each Committee meeting, not less than half of the members must attend to constitute a quorum. The Committee may invite members of management or advisers to attend meetings and provide pertinent information.

A resolution of the Committee is derived from majority votes of the committee members participating in the meeting. Any member who may stand to gain or lose in relation to any item on the agenda, shall not comment or vote on the matter thereof. If the voting results in a tie, the chair of the meeting shall cast an additional decisive vote.

If the Chairman is absent at a meeting or cannot carry out the duty, a majority of the Committee members present shall appoint one member as a Chairman for that meeting.

4. RESPONSIBILITIES AND DUTIES

The Committee shall have the responsibilities as follows;

(1) To take part in the conformity of the processing and to ensure independently its compliance

The Committee shall ensure that all the processing activities put in place by the data controller or processor are compliant with all relevant laws and regulations related to personal data protection.

(2) To establish and maintain the list of processing activities ("records of processing activities")

The Committee shall handle the documentation that the data controller/ processor has the obligation to establish, according to PDPA, and, in particular, list the personal data processing.

(3) Analysing, investigating, auditing, controlling

The Committee may leads or supervises any action allowing to judge the state of the organisation's conformity, and to pinpoint the non-compliant processes and items (their seriousness, their possible impacts for data subjects, their origin and its responsibility, etc.).

(4) Providing recommendations and warnings

The Committee may advise the data controller/processor and expresses documented and reasoned opinions and recommendations.

(5) Informing and raising awareness of data protection culture

- makes sure that data subjects are informed of their rights and of any processing made by the organisation involving their personal data;
- heads or supervises actions for the awareness of the direction and colleagues on the rules to be observed with regard to personal data protection;
- presents in a favourable and positive manner the efforts to comply with data protection requirement in a way that builds trust in data subjects and/or differentiate the organisation.

(6) Being a contact & coordination point

The Committee receives complaints and demands from natural persons whose personal data are processed by the data controller/processor and makes sure that their rights are respected. Being contact point for communicating with the data protection authority.

(7) Giving the alarm if necessary

The Committee shall inform without delay the data controller/ processor if staff initiatives or the lack of observance of their recommendations would put at risk the organisation.

5. REPORTING

The Data Privacy Committee directly reports to the company's Board of Directors, and it has the constant duty to report their performance or significant obstacles to the Board of Directors so that they can acknowledge the performance, potential risks or matters that need to be taken into consideration and be aware of as to significant corporate governance issues as well as factors that may affect the operations of the company in the future. Nevertheless, in urgent cases, the Data Privacy Committee may report to the Board of Directors prior to the next meeting of the company's Board of Directors.

6. REVIEW AND AMENDMENT OF THE CHARTER

An annual review of the charter is required by the Data Privacy Committee to ensure its appropriateness and relevance with the current circumstances.

7. EFFECTIVE DATE

This Charter was approved by the Board of Directors in the 2/2023 Meeting on 16 February 2023, with effect from that date onward.

Revision History

Date	Status	Details of Revision
23 December 2021	Cancelled	-
25 March 2022	Cancelled	- Changing Company name
11 May 2022	Cancelled	- Revising Clause 2 by adding conflicts of interest
16 February 2023	Effective	- Adding Clause 5 and 6: reporting and review and amendment of the charter